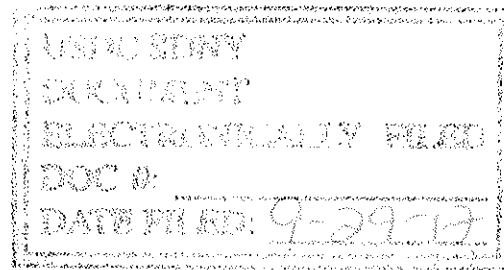


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF JULIO
MIGUEL ORLANDINI-AGREDA AND
COMPAÑIA MINERA ORLANDINI
LTDA. FOR AN ORDER DIRECTING
DISCOVERY FROM GIBSON, DUNN &
CRUTCHER LLP PURSUANT TO
28 U.S.C. § 1782



Misc. Action No. _____

[PROPOSED] ORDER

Upon consideration of the Petition for Discovery in Aid of a Foreign Proceeding Pursuant to 28 U.S.C. § 1782 (the “Petition”), submitted by Petitioners Julio Miguel Orlandini-Agreda and Compañía Minera Orlandini Ltda., and all papers submitted in support thereof, this Court finds that (1) the statutory requirements of 28 U.S.C. § 1782 are satisfied, and (2) the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241 (2004), weigh in favor of granting the Petition. It is therefore

ORDERED that the Petition is granted, and that Petitioners are hereby authorized to serve the subpoena annexed to the Petition as Exhibit A upon Gibson, Dunn & Crutcher LLP (“Gibson Dunn”); and it is further

ORDERED that Gibson Dunn comply with such subpoena in accordance with and subject to its rights under the Federal Rules of Civil Procedure and the Rules of this Court.

SO ORDERED

Date: September 28 2017

U.S.D.J.

Anthony J. Presky